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VICTIM

FILED

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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR25-02403 TUC-RM(LCK)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Deeno Jackson,
Defendant.

INDICTMENT

Violations:

18 U.S.C. § 1343
(Wire Fraud)

Count 1

18 U.S.C. § 1349
(Conspiracy to Commit Wire Fraud)

Count 2

Forfeiture Allegation
18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)

THE GRAND JURY CHARGES:

COUNT 1

WIRE FRAUD

[18 U.S.C. § 1343]

1. From a time unknown and continuing through approximately March, 2025 in the District of Arizona, and elsewhere, the defendant DEENO JACKSON

1 (“JACKSON”), with the intent to defraud, knowingly and willfully participated in,
2 devised, and intended to devise a scheme and artifice to defraud, and a scheme to
3 obtain money and property by materially false and fraudulent pretenses,
4 representations, and promises.

5 **Scheme to Defraud**

- 6 2. JACKSON and at least one or more person knowingly and with the intent to defraud,
7 engaged in a scheme to defraud through materially false statements to obtain money
8 and property from one or more elderly victims from around the United States to
9 include Arizona. Elderly victims were defrauded in what is commonly referred to
10 as a lottery fraud, sweepstakes fraud, or “You’ve Won” scam. Generally,
11 JACKSON and others, through materially false representations, created the false
12 impression that the victims won a prize such as the lottery or sweepstakes. The co-
13 schemers communicated that to obtain these winnings, the victims were required to
14 pay taxes or other fees. In furtherance of the fraud scheme, the co-schemers falsely
15 represented that they were legitimately acting on behalf of the government such as
16 pretending to be representatives of the FBI, CIA, or IRS. One of the victims was
17 also mailed a safe to his home. The fraudsters told the victim that the safe was rigged
18 with explosive powder that would destroy the promised cash winnings that were
19 allegedly inside the safe if opened with the wrong combination. To obtain the
20 combination, the victim was also told to pay more fees. These representations were
21 false and fraudulent. The co-schemers made these false and fraudulent
22 representations with intent to defraud solely to obtain the victims’ money and
23 without any intent to provide the prize winnings.

24 **Execution of the Scheme by Wire Communication**

- 25 3. On or about January 24, 2023, for the purpose of and as an essential part of executing
26 the scheme to defraud, defendant JACKSON, did knowingly cause to be transmitted
27 by means of wire and electronic communication signals in interstate or foreign
28 commerce: that is, an electronic communication relating to a \$7,000 cashier’s check

1 deposited by victim J.P. into J.P. Morgan Chase bank account ending in 1238 all in
2 violation of Title 18, United States Code Section 1343.

3 **COUNT 2**

4 **Conspiracy to Commit Wire Fraud**

5 **[18 U.S.C. § 1349]**

- 6 1. The factual allegations in paragraphs 1 – 3 are re-alleged and incorporated by
7 reference as if fully stated herein.
- 8
- 9 2. From a time unknown but at least from December 2022 and continuing through
10 approximately October 2023 in the District of Arizona, and elsewhere, defendant
11 JACKSON and at least one or more persons, knowingly and intentionally combined,
12 conspired, and agreed with each other, to commit an offense against the United
13 States: to wit: Wire Fraud in violation of Title 18, United States Code, Section 1343.

14 **Object of the Conspiracy**

- 15 3. It was the object of the conspiracy to knowingly and with the intent to defraud,
16 engage in a scheme to defraud through materially false statements to obtain money
17 and property from at least one elderly victim, J.P., in Arizona. The manner and
18 means employed by the co-conspirators to achieve the object of the conspiracy are
19 described in paragraphs 1 – 3 of the indictment.
- 20 4. As an essential part of and in furtherance of the conspiracy, the co-conspirators
21 caused to be used at least one or more electronic communications in interstate and
22 foreign commerce.
- 23 5. The defendant JACKSON knew the object of the conspiracy was to engage in the
24 fraud scheme to obtain money and property by means of materially false and
25 fraudulent representations. JACKSON joined such conspiracy with the intent to
26 further its unlawful purpose. All in violation of Title 18, United States Code, Section
27 1349.
- 28

FORFEITURE ALLEGATION

6. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1349 and 1343 set forth in Counts One and Two of this Indictment, the defendant JACKSON, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.
7. The property to forfeited includes but is not limited to: a sum of money equal to the proceeds traceable to the offenses.
8. If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

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1 All in violation of Title 18, United States Code, Section 981(a)(1)(C) and
2 Title 28, United States Code, Section 2461(c).

3 A TRUE BILL

4
5 /s/
6 FOREPERSON OF THE GRAND JURY
Dated: May 21, 2025

7
8 TIMOTHY COURCHAINED
United States Attorney
9 District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

10 /s/
11 JONATHAN B. GRANOFF
VINCENT J. SOTTOSANTI
12 Assistant U.S. Attorneys